

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Chapter 11
Symmetry Tower / Chicago, LLC) Case No. 2023-07151
Debtor in Possession) Judge David Cleary
) Trustee

NOTICE OF MOTION

TO: Via U.S. Mail: See attached Service List

PLEASE TAKE NOTICE THAT on 28th day of June, 2023, at 10:00 am, I will appear before the Honorable Judge David Cleary, U.S. Bankruptcy Judge, or any other judge sitting in that judge's place, and request a hearing on the **Debtor's Motion to Extend Time to File Chapter 11 Schedules, and Statement of Financial Affairs**, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government (audio only).

To appear by Zoom using the internet, go to this link: <<https://www.zoomgov.com/>>. Then enter the meeting ID and password.

To appear by Zoom using telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is as follows: Meeting ID: 161 122 6457; Passcode: Cleary644. The meeting ID and password can also be found on the judge's page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

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CERTIFICATE OF SERVICE

I, Laxmi P. Sarathy, an Attorney, certify that on the 14th day of June, 2023, I served a copy of this notice and the attached motion on each entity shown on the service list below in the manner indicated below.

/s/ Laxmi P. Sarathy

SERVICE LIST:

Notified via E.C.F. Only:

U.S. Trustee: Patrick Layng, Office of the U.S. Trustee, Region 11, 210 S. Dearborn, Ste 873, Chicago, IL 60604

Notified via U.S. Mail Only: See attached

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:) Chapter 11
Symmetry Tower / Chicago, LLC) Case No. 2023-07151
Debtor (in Possession)) Judge David Cleary
) Trustee

**DEBTOR'S MOTION TO EXTEND DEADLINE TO FILE SCHEDULES, STATEMENT OF
FINANCIAL AFFAIRS, PLAN, (B22C STATEMENT OF CURRENT MONTHLY INCOME,
AND APPLICABLE TAX RETURNS)**

Ch 11: Symmetry Tower / Chicago, LLC (“Debtor”), by and through his/her attorney Laxmi P. Sarathy, moves this Court under Section 521 of the U.S. Bankruptcy Code (the “Code”) and Bankruptcy Rule 1007(c) for an order extending the time to file the schedules, statement of financial affairs, plan, and (B22C Statement of Current Monthly Income). In support of this Motion, the Debtor states the following:

1. The Debtor filed this voluntary petition for relief under Chapter 11 of the Code on May 31, 2023.
2. Bankruptcy Rule 1007 (c) requires that the Debtor file her schedule and statement of financial affairs within fourteen (14) days of filing the Petition for relief, unless the Debtor shows cause for an extension, and the Court grants such request.
3. Debtor operates as a single asset real estate involving several parcels of land encumbered by various state, local, secured and other unsecured creditors.
4. Undersigned counsel is in the process of completing the schedules including all the relevant information but requires additional time to complete them.
5. Undersigned counsel anticipates that she should be able to prepare and file the remaining documents prior to the hearing.

WHEREFORE, for the foregoing reasons, the Debtor and undersigned counsel requests this Court to grant an extension of time to file the schedules, statement of financial affairs, plan, until June 28, 2023, and for such other relief that this court deems just and proper under the circumstances.

Respectfully Submitted
Symmetry Tower / Chicago, LLC,

Debtor in Possession

By: /s/ Laxmi P. Sarathy
One of its Proposed Counsel

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